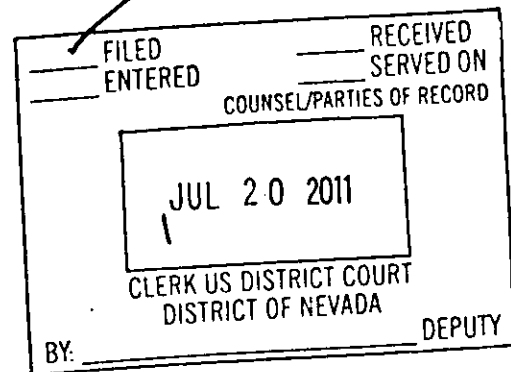


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UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA

JAMES H. DONELL, RECEIVER FOR  
 J.T. WALLENBROCK & ASSOCIATES AND  
 CITADEL CAPITAL MANAGEMENT GROUP, INC.,

Plaintiff,

vs.

NAOMI E. BRAUN, an individual,

Defendant.

NAOMI E. BRAUN,

Counterclaimant,

vs.

JAMES H. DONELL, RECEIVER FOR  
 J.T. WALLENBROCK & ASSOCIATES AND  
 CITADEL CAPITAL MANAGEMENT GROUP, INC.;  
 DOES 1 through 10, inclusive,

Counterdefendants.

Case No. CV-07-00273 ECR-RAM

**STIPULATION TO CONTINUE  
 TRIAL DATE PENDING EXECUTION  
 OF SETTLEMENT DOCUMENTS;  
 [PROPOSED] ORDER THEREON**

1 TO THE HONORABLE EDWARD C. REED, UNITED STATES DISTRICT  
2 COURT JUDGE:

3 James H. Donell, Receiver for J.T. Wallenbrock & Associates ("Wallenbrock") and  
4 Citadel Capital Management Group, Inc. ("Citadel"), plaintiff in the above-captioned matter  
5 ("Plaintiff"), Naomi E. Braun, defendant and third-party plaintiff in the above-captioned  
6 matter ("Defendant"), and Kirk Braun, third-party defendant in the above-captioned matter  
7 ("Kirk Braun," together with Plaintiff and Defendant, the "Parties"), hereby stipulate as  
8 follows:

9 RECITALS

10 A. This case is scheduled for a jury trial to commence on July 26, 2011 ("Trial  
11 Date").

12 B. As set forth in the February 24, 2011 Stipulation to Continue Trial Date  
13 Pending Global Settlement, the parties settled this matter, subject to the approval of the  
14 United States District Court for the Central District of California, Los Angeles Division,  
15 where Plaintiff was appointed as receiver for Wallenbrock and Citadel in case number 2:02-  
16 cv-00808-R-SH ("Receivership Case").

17 C. On June 27, 2011, the Court in the Receivership Case approved Plaintiff's  
18 settlement of this case.

19 D. In order to consummate the settlement between the parties certain real estate  
20 documents must be prepared and executed by the parties.

21 E. Plaintiff has requested a local title company in the Reno, Nevada area to  
22 prepare the required documents.

23 F. As of the preparation of this stipulation Plaintiff has not received the required  
24 documents from the title company. Plaintiff expects to receive the documents within the  
25 next week.

26 G. Pursuant to this court's February 24, 2011 order, the following deadlines were  
27 set by the Court:

28 i. calendar call for this case will be held on Monday, July 25, 2011, at 9:00

1 a.m. (the "Calendar Call"); and

2 ii. Proposed jury instructions shall be filed with the Clerk of the Court on or  
3 before Monday, July 18, 2011 (the "Jury Instructions Cutoff");

4 H. In anticipation of the Trial Date, and in order to allow the settlement between  
5 the Parties to be consummated, the Parties have agreed to continue the Trial Date for  
6 approximately 30 days, or for such longer time as the Court finds convenient and/or just and  
7 proper.

8 **WHEREFORE**, the Parties hereby stipulate as follows:

9 1. The Trial Date be continued for approximately 30 days, or for such longer time  
10 as the Court finds convenient and/or just and proper;

11 2. The Calendar Call be continued for approximately 30 days, or for such longer  
12 time as the Court finds convenient and/or just and proper;

13 3. The Jury Instructions Cutoff be continued for approximately 30 days, or for  
14 such longer time as the Court finds convenient and/or just and proper.

15  
16 DATED: July 20, 2011

ERVIN COHEN & JESSUP LLP  
Byron Z. Moldo

17  
18  
19 By: /s/ Byron Z. Moldo  
Byron Z. Moldo  
20 Attorneys for Plaintiff, JAMES H. DONELL,  
RECEIVER

21  
22 DATED: July 20, 2011

ROBISON, BELAUSTEGUI, SHARP & LOW  
Michael E. Sullivan

23  
24  
25 By: /s/ Michael E. Sullivan  
Michael E. Sullivan  
26 Attorneys for Defendant/Third-Party Plaintiff  
Naomi E. Braun  
27  
28

1 DATED: July 20 2011

2 Kirk Braun

3 By: Kirk Braun

4 Kirk Braun

5 In Proper Person/Third-Party Defendant

6 ORDER

7 It is hereby **ORDERED** that:

8 1. The Trial Date is continued from Tuesday, July 26, 2011, at 10:00 a.m., to

9 SEPTEMBER 27 2011. @ 10:00 a.m.

10 2. The Calendar Call is continued from Monday, July 25, 2011, to

11 SEPTEMBER 26 2011. @ 9:00 a.m.

12 3. The Jury Instructions Cutoff is continued from Monday, July 18, 2011, to

13 SEPTEMBER 19 2011. @ 4:00 p.m.

14  
15  
16 DATED: July 20 2011

17 Edward C. Reed

18 EDWARD C. REED  
19 UNITED STATES DISTRICT COURT  
20 JUDGE